

Exhibit B

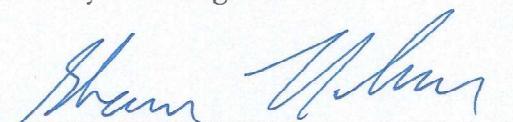
SWORN DECLARATION OF SHAWN NOLAN

I, Shawn Nolan, a resident of Pennsylvania, hereby declare, under penalty of perjury, the following:

1. I have been a licensed attorney in Pennsylvania since 1989. I am the Chief of the Capital Habeas Unit ("CHU") for the Federal Community Defender Office for the Eastern District of Pennsylvania. Our CHU represents death sentenced prisoners in post-conviction proceedings throughout Pennsylvania and in jurisdictions outside of Pennsylvania when appointed by a federal court.
2. Recently, my office and I represented Dustin Higgs and Dustin Honken in end stage litigation prior to their executions by the federal government on January 16, 2021 (Mr. Higgs) and July 17, 2020 (Mr. Honken).
3. The Bureau of Prisons ("BOP") approved the attendance of a spiritual advisor of Mr. Higgs' and Mr. Honken's choosing in the execution chamber during the execution of each. The BOP approved each request approximately two weeks before the scheduled execution.
4. Neither spiritual advisor was an employee of the BOP or the federal government.
5. Each spiritual advisor went through the same standard background check required of all visitors to BOP facilities. Neither received any training.
6. Neither spiritual advisor caused any sort of disruption or disturbance in the execution chamber.

I hereby declare, pursuant to 28 U.S.C. 1746, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 21st day of January, 2021.



Shawn Nolan
Chief, Capital Habeas Unit
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District of Pennsylvania
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